

EXHIBIT E

Will Routt

From: Horton, Odell [ohorton@wyattfirm.com]
Sent: Thursday, September 20, 2018 5:42 PM
To: Frank Watson
Cc: Lee Whitwell (lee.whitwell@shelbycountyttn.gov); Craddock, Bob; Will Routt; Beth W. Petronio (beth.petronio@klgates.com); btimmons@blackmclaw.com; mmclaren@blackmclaw.com; Will Cochran; Bill Burns; Floyd, Amber; Horton, Odell
Subject: RE: Shelby County Jail Case/Protective Order and Production

Frank:

We spoke to our client regarding providing the names of the individuals. It is our opinion there is a privacy concern regarding disclosing the names. We are available to discuss this issue with you next week. We are available September 27th or 28th. Please let us know your availability.

We discussed the verification issue with our client. We will update you next week regarding this issue.

If you have any questions, please contact us.

Odell

Odell Horton Jr.

Wyatt, Tarrant & Combs, LLP
Direct: (901) 537-1082

-----Original Message-----

From: Frank Watson [mailto:fwatson@watsonburns.com]
Sent: Monday, September 17, 2018 1:34 PM
To: Floyd, Amber
Cc: Horton, Odell; Lee Whitwell (lee.whitwell@shelbycountyttn.gov); Craddock, Bob; Will Routt; Beth W. Petronio (beth.petronio@klgates.com); btimmons@blackmclaw.com; mmclaren@blackmclaw.com; Will Cochran; Bill Burns
Subject: Re: Shelby County Jail Case/Protective Order and Production

Dear Counsel:

I am following up with my below request as to the County Defendants' addition of the names of the arrestees in the spreadsheet they recently produced. Please let me know about this issue this week.

Additionally, the County Defendants' letter provides supplemental responses to the Plaintiffs' discovery. For example, that letter describes that probable cause hearings are conducted within 48 hours of any arrest without a warrant. Can you please formally supplement your clients' responses with a verification, so that we can all be on the same page? Please let me know.

Many thanks

Frank L. Watson, III
Watson Burns, PLLC
253 Adams Avenue

Memphis, Tennessee 38103
(901) 529-7996
www.watsonburns.com

> On Sep 11, 2018, at 8:23 AM, Frank Watson <fwatson@watsonburns.com> wrote:
>
> Dear Bob, Odell and Amber:
>
> Thanks for your clients' response. I just got back in town from a trip overseas and am just beginning to review, so it may be several days until I can get back to you all.
>
> In the meantime, I did want to request (as I believe we had done in our November 2017 letter) that you add to the spreadsheet the name of each arrestee - without this information we can't identify any class member, including our very own clients. It would seem that this could be easily done. Please let me know if your clients will do so.
>
> Many thanks
>
> Frank L. Watson, III
> Watson Burns, PLLC
> 253 Adams Avenue
> Memphis, Tennessee 38103
> (901) 529-7996
> www.watsonburns.com
>
>
>> On Sep 7, 2018, at 5:17 PM, Floyd, Amber <afloyd@wyattfirm.com> wrote:
>>
>> Please see attached.
>>
>> Thanks,
>>
>>
>> Amber D. Floyd
>>
>> Wyatt, Tarrant & Combs, LLP
>> Direct: (901) 537-1054
>> From: Frank Watson [mailto:fwatson@watsonburns.com]
>> Sent: Friday, September 07, 2018 9:36 AM
>> To: Horton, Odell
>> Cc: Lee Whitwell (lee.whitwell@shelbycountyttn.gov); Craddock, Bob;
>> Floyd, Amber; Will Routt; Beth W. Petronio
>> (beth.petronio@klgates.com); btimmons@blackmclaw.com;
>> mmclaren@blackmclaw.com; Will Cochran; Bill Burns
>> Subject: Re: Shelby County Jail Case/Protective Order and Production
>>
>> Sure thing, Odell.
>>
>> (I just flew in, so maybe we chat on Monday). We do need a formal
>> response to our letter of November 2017, so we know exactly what your
>> clients are willing to produce and what they are not. Thanks Frank L.
>> Watson, III Watson Burns, PLLC
>> 253 Adams Avenue
>> Memphis, Tennessee 38103
>> (901) 529-7996
>> www.watsonburns.com<http://www.watsonburns.com>

>>
>>
>> On Sep 7, 2018, at 9:23 AM, Horton, Odell
<ohorton@wyattfirm.com<mailto:ohorton@wyattfirm.com>> wrote:
>> Frank:
>>
>> Shelby County is ready to produce its spread sheets pursuant to our prior telephone
conversation and other documents. Since we do not have a signed Protective Order in this
case, are you agreeable to the same terms for Shelby County's production as Tyler's
production:
>>
>> The Parties agree that all documents will be treated as Confidential. Plaintiffs agree
that they will not disseminate these documents to anyone other than interim class counsel
until a Protective Order is entered. Once that Order is entered, then the Order will govern.
>>
>> If this is agreeable, please let me know.
>>
>> Thank you.
>>
>> Odell
>>
>> Odell Horton Jr.
>> Wyatt, Tarrant & Combs, LLP
>> 6070 Poplar Ave., Suite 300
>> Memphis TN 38119-3907
>> Direct: (901) 537-1082
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>> =====
>> <Response Letter dated 9-2-18.pdf>
>> <SC_00408 OMS_Report_12_21_17.pdf>
>> <SC_00741 Kimberly Allen_Redacted.pdf>

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